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13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA
15 LAS VEGAS DIVISION

16 **DASHMESH ENTERPRISES, INC.**
17 **A NEVADA CORPORATION D/B/A**
18 **YOUR STOP, and**
19 **RAVINDER S. GREWAL,**
20 an Individual, and
21 **RAJWANT K. GREWAL,**
22 an Individual

23 Plaintiffs,

24 v.

25 **UNITED STATES OF AMERICA,**
26 Defendant.

CASE NO. 2:19-cv-01655-GMN-NJK
PLAINTIFFS' UNOPPOSED
MOTION FOR ENLARGEMENT
OF TIME TO FILE REPLY BRIEF
IN OPPOSITION TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT

27 The Plaintiffs, DASHMESH ENTERPRISES, INC. a Nevada Corporation
28 d/b/a YOUR STOP, RAVINDER S. GREWAL, an Individual, and RAJWANT K.
GREWAL, an individual, by and through their undersigned counsel, and hereby

1 respectfully move the Court for an enlargement of time to file its reply brief in
2 opposition to Defendant's Motion For Summary Judgment filed on November 23,
3 2020 (Doc. 37), from January 4, 2021 up to and including January 6, 2021, and
4 respectfully moves this Honorable Court for an entry of the attached proposed Order.
5

6 **CASE HISTORY & BACKGROUND**
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8 1. On November 23, 2020, Defendant's filed their Motion for Summary
9 Judgment (Doc. 37).
10

11 2. Local Rule 7-2(b) provides that the Plaintiffs Response to the
12 Defendant's Motion for Summary Judgment was due December 14, 2020.

13 3. On November 25, 2020, the Plaintiffs filed an Unopposed Motion for
14 Enlargement of time to File Reply Brief in Opposition to Defendant's Motion for
15 Summary Judgment from December 14, 2020 to January 4, 2021 (Doc.38), which
16 was granted by this Court on December 1, 2020 (Doc. 39).
17

18 4. Since the Plaintiffs' motion, intervening issues have caused problems
19 necessitating a brief extension in the Plaintiffs' time for response. Most significantly
20 of these problems includes the unexpected and emergency hospitalization of one of the
21 undersigned's paralegals in evening hours of January 3rd, 2021, resulting in a number
22 of additional deadlines for January 4th that need to be completed. In addition thereto,
23 the undersigned received more than thirty administrative deadlines (for which the
24 undersigned had ten (10) days' notice to compile responses and administrative briefs)
25 were unexpectedly due between December 28th, 2020 and January 1st, 2021.
26
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1 5. In the interests of providing the Court a more well-organized filing in
2 response to the Government's summary judgment motion, the Plaintiffs' counsel
3 believes that a two (2) day extension to January 6th, 2021 is necessary to complete the
4 response to the Defendant's Motion for Summary Judgment.
5

6 6. The undersigned's office has conferred with the Defendant's counsel
7 regarding this extension and was advised that the Defendant has no objection to the
8 requested extension.
9

10 7. This is the Plaintiffs' second motion to extend time for filing their
11 response in opposition to the Defendant's Motion for Summary Judgment.
12

13 8. As such, Plaintiffs request entry of an order granting them an extension
14 up to and including January 6, 2021, an additional two (2) days, within which to file
15 and serve their Response to the Defendant's Motion for Summary Judgment.
16

17 9. The Plaintiffs do not believe the requested extension will result in undue
18 delay of this matter.
19

20 **WHEREFORE**, for the reasons set forth above, Plaintiffs, Dashmesh
21 Enterprises, Inc., a Nevada Corporation d/b/a Your Stop, Ravinder S. Grewal, an
22 Individual, Rajwant K. Grewal, an individual, respectfully request this Court enter
23 an order granting the unopposed motion, and granting up to and including January 6,
24 2021 for the Plaintiffs' Response to the Defendant's Motion for Summary Judgment.
25
26
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1 Dated: January 4, 2021

Respectfully submitted,

3 By: /s/ Andrew Z. Tapp

4 Andrew Z. Tapp (FBN 68002)

Pro Hac Vice

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17 **COUNSEL FOR PLAINTIFFS**

18 **CERTIFICATE OF SERVICE**

19 **I HEREBY CERTIFY** that on January 4, 2021, I electronically filed the
20 foregoing with the Clerk of the Court using the CM/ECF system, which will send
21 notification of such filing to the following:
22

23 Patrick A. Rose, Esq.
24 Patrick.Rose@usdoj.gov
25

26 /s/ Andrew Z. Tapp

27 Andrew Z. Tapp (FBN 68002)

28 *Pro Hac Vice*

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23 Defendant.

CASE NO. 2:19-cv-01655-GMN-NJK

**ORDER GRANTING PLAINTIFFS'
UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO
FILE REPLY BRIEF IN
OPPOSITION TO DEFENDANT'S
MOTION FOR SUMMARY
JUDGMENT**


(Docket No. 40)

24 Pending before the Court is Plaintiffs' Unopposed Motion for Enlargement of
25 Time to File Reply Brief in Opposition to Defendant's Motion for Summary
26 Judgment, Docket No. 40. The Court having reviewed the unopposed motion
27
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1 therefore **GRANTS** the motion, Docket No. 40. The Plaintiffs, Dashmesh
2 Enterprises, Inc., a Nevada Corporation d/b/a Your Stop, Ravinder S. Grewal, an
3 Individual, and Rajwant K. Grewal, an individual may file their reply brief in
4 opposition to Defendant's Motion for Summary Judgment on or before January 6,
5 2021.
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9 **IT IS SO ORDERED.**

10 Dated this 4 day of January, 2021.

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15 Gloria M. Navarro, District Judge
16 UNITED STATES DISTRICT COURT
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